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Attorneys for Plaintiff Angela Bangert

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Angela Bangert,

Plaintiff,

v.

Trans Union, LLC, Equifax
Information Services, LLC, Experian
Information Solutions, Inc., and SoFi
Bank, N.A.,

Defendant.

Case No.: 2:22-cv-01418-RFB-EJY

**Stipulation to extend the deadline for
Plaintiff to file her motion for fees
and costs**

(First request)

Angela Bangert (“Plaintiff”) and SoFi Bank, N.A. (“Defendant” and jointly as the “parties”), by and through their respective counsel, hereby stipulate to extend the deadline for Plaintiff to file her motion for fees and costs. On March 26, 2025, Plaintiff filed her notice of acceptance of Defendant’s Offer of Judgment. ECF No. 83. Under the Offer of Judgment, Plaintiff’s reasonable attorneys’ fees and costs, is

1 to be “determined by the Court if the parties are unable to reach an agreement on
2 said amount.” ECF No. 83-1, ¶ 5.

3 Judgment was entered on March 28, 2025. ECF No. 84. Under Rule 54 of the
4 Federal Rules of Civil Procedure, Plaintiff’s motion for attorney’s fees and costs is
5 currently due on April 11, 2025. The parties require additional time to attempt to
6 resolve the issue of attorneys’ fees and costs without seeking the Court’s assistance.
7 The parties therefore request to extend the deadline and stipulate that Plaintiff’s
8 motion for fees and cost shall be filed on or before **April 25, 2025**.

9 This is the first request for an extension of this deadline.

10 Dated this 11th day of April 2025.

11 **KIND LAW**

12 /s/ Michael Kind

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Counsel for Plaintiff

16 **BALLARD SPAHR LLP**

17 /s/ Jenny Nicole Perkins

18 Jenny Nicole Perkins, Esq.
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21 *Counsel for SoFi Bank, N.A.*

22
23 IT IS SO ORDERED:

24 

25 RICHARD F. BOULWARE, II
26 UNITED STATES DISTRICT JUDGE

27 DATED: This 16th day of April, 2025.